6.0 RESULTS AND CONCLUSIONS

6.1 EXPLANATION OF RECYCLED URANIUM FLOW PATHS

6.1.1 Flow of RU into ORGDP

RU entered ORGDP through three primary pathways. ORGDP received RU via:

- **Receipts of 16,268 MT** of RU oxide provided as feed to ORGDP by Hanford, Savannah River, and Harshaw Chemical Company. This oxide was processed in the ORGDP feed production facility.
- **Receipts of 1,294 MT** of RU as UF₆ feed from commercial enrichment customers (primarily nuclear utilities in France, the United Kingdom, and Germany). From 1969 to 1988, 807 MTU was fed to the ORGDP cascade; 486 MTU was shipped to PGDP in 1986; and 1 MTU was returned to France in 1988.
- **Receipts of 1,092 MT** of RU as UF₆ feed from PGDP, ORNL, and PORTS (99.2% from PGDP) during 1953 to 1970. This material was fed into the ORGDP cascade.

RU receipts totaled 18,654 MTU. In addition, ORGDP received:

Partially enriched product from PGDP that contained ⁹⁹Tc and trace quantities of Np (although this PGDP enriched product was not technically RU). ORGDP received a total of 86,385 MTU as enriched UF₆ from PGDP during 1953 to 1985 that was fed into the ORGDP cascade.

The 18,654 MTU of RU received by ORGDP is estimated to have contained the following quantities of the RU constituents of concern:

- Pu: 71.5 g (based on data from RU receipts obtained from correspondence of the ORGDP Laboratory Superintendent). Of this 71.5 g, only 0.01 to 0.04 g is projected to have entered the ORGDP cascade. The overwhelming majority of Pu was concentrated in the ash from the feed plant, and a small fraction was retained as cylinder heels. This estimate is modestly higher than the Parks estimate of 60 g.
- Np: 9 kg (based on ORNL composite sample analysis prior to 1957 and PGDP sample analysis from 1957 to 1967). Of this 9 kg, 0.8 kg is estimated to have entered the ORGDP cascade, along with up to 0.17 kg of Np that was fed to the ORGDP cascade in PGDP enriched product. Approximately 75% of the Np received by ORGDP in RU UO₃ is estimated to have remained in feed plant ash and cylinder heels. Almost 1.5 kg of Np was shipped to PGDP in UF₆ from the ORGDP feed plant. Analysis for Np performed by ORNL in 1955 and early 1957 on composite samples of Hanford and Savannah River RU show much higher concentrations of Np (0.78 ppm Np average) than subsequent analysis reported by Smith (0.24 ppm Np average) for the period from mid-1957 through 1967. This estimate is based on using the ORNL analysis for estimated Np concentration during 1952 through

- mid-1957 and the Smith analysis for the period from mid-1957 through 1963, when shipments from Hanford and Savannah River to ORGDP ceased.
- ⁹⁹Tc: 135 kg (based on measurements performed from 1959 to 1973 on Tc content in RU from Hanford and Savannah River). Of this 135 kg, 45 kg is estimated to have entered the ORGDP cascade in the RU feed stream—along with up to 165 kg of ⁹⁹Tc contained in PGDP enriched product (based on PGDP data for 1972–1982 and ORGDP measurements of ⁹⁹Tc in PGDP product during 1962–1963). Approximately 70 kg of ⁹⁹Tc was shipped to PGDP in UF₆ from the ORGDP feed plant. In the ORGDP cascade, ⁹⁹Tc tended to accumulate at the top of the cascade or to migrate to the purge cascade points at the high end of the plant configuration, where it was trapped and/or vented.

6.1.2 Flow of RU Out of ORGDP

RU streams exited ORGDP via:

- Shipment to PGDP and PORTS of RU converted to UF₆ or UF₄.
- Shipment of RU fluorination tower waste ashes to PGDP (which subsequently shipped them to Fernald)
- Shipment of product enriched in the ORGDP cascade to the Y-12 Plant, PORTS, and to private-sector companies fabricating fuel for commercial enrichment customers.
- Shipment of tails from the ORGDP enrichment cascade to PGDP for additional "stripping" in the PDGP cascade.
- Shipment of RU from commercial enrichment customers to PGDP after ORGDP was placed on standby (without re-enriching the RU in the ORGDP enrichment cascade).
- Shipment of cylinder heels at ORGDP to PGDP after ORGDP was placed on standby.

ORGDP shipped a total of 12,141 MT of RU to the following sites:

•	PGDP	11,629 MTU
•	PORTS	301 MTU
•	Y-12 Plant	189 MTU
•	ORNL	8 MTU
•	Savannah River	11 MTU
•	Fernald	2 MTU
•	Foreign	1 MTU

ORGDP fed 5,915 MT of RU into the ORGDP cascade. Cumulative losses and material unaccounted for (MUF) for RU material at ORGDP totaled 598 MTU. The RU mass balance for ORGDP is summarized in Table 6.1-1.

Table 6.1-1. ORGDP RU Mass Balance

Category	MT of RU
ORGDP shipments	12,141
Feed to ORGDP cascade	5,915
Cumulative losses and RU material unaccounted for (MUF)	598
Subtotal	18,654
ORGDP receipts	18,654

6.1.3 Potential Flow Pathways of RU within ORGDP

Once an RU stream entered ORGDP, RU constituents of concern had the potential to reach various facilities and equipment via pathways associated with:

- Oxide conversion to UF₆ for feed
- Cascade buildings and operations
- Uranium recovery operations
- Analytical laboratories

The potential pathways associated with each of these groups of operations are described in the following sections.

6.1.3.1 Oxide Conversion to UF₆ for Feed Pathways

The process of converting RU oxide to UF₆ for feed for the ORGDP enrichment cascade involved the following potential pathways:

- Unpacking, feeding, and sampling of UO₃
- Collecting ash for uranium recovery and cleaning fluorination tower filters
- Uranium recovery from ash
- Maintenance and repair of fluorination tower and associated equipment

6.1.3.2 Cascade Buildings and Operations Pathways

ORGDP enrichment cascade operations involved the following potential pathways:

- Feeding UF₆ from cylinders to cascade
- Inadvertent releases of UF₆ within cascade buildings or from piping
- Withdrawal of product
- Withdrawal of tails
- Venting process gas to atmosphere
- CIP/CUP and other equipment removal

6.1.3.3 Uranium Recovery Operations Pathways

Uranium recovery operations involved the following potential pathways:

- Cleaning heels from UF₆ feed cylinders
- Decontamination of equipment
- Processing of wastes for uranium recovery
- Handling of scrap metal from equipment
- Removal and storage of pond sludge
- Thermal drying and repackaging of pond sludge
- Recovery of uranium deposits from process equipment
- Servicing cascade chemical traps
- Discharge of wastes associated with recovery processes to holding ponds

6.1.3.4 Analytical Laboratories

Because of the protocols and processes involved in analytical laboratory analysis at ORGDP, these operations created no significant pathways for RU.

6.2 IDENTIFICATION OF PROCESSES OR FACILITIES THAT INVOLVED POTENTIAL WORKER EXPOSURE TO RU CONSTITUENTS

Processes and facilities that involved potential worker exposure to RU constituents coordinate closely with the pathways for the flow of RU within ORGDP described in Section 6.1.3. Table 6.2-1 summarizes the activities that were rated by the ORGDP Site Team as "High" in occupational exposure potential—and that consequently have significant implications for potential personnel exposure. For each activity, the table includes information on location, time frame, and RU constituents of concern. (A complete summary of activities at ORGDP with potential for worker exposure to RU is provided in Table 2.4-1.)

Table 6.2-1. Activities Rated High in Exposure Potential

Location	Activity	Time Frame	Constituents	Occupational Exposure Potential
	Oxide Conversion			
K-1131 K-1420	 1A. Unpacking, feeding of UO₃ to process, operation and pulling samples * Exposure potential would have been high for brief periods in Jan-Apr 1953 when Pu ranged as high as 40 ppb in material from Hanford 	1952-1961 1960-1963	Estimated levels in UO ₃ 520 ppb Np 4.4 ppb Pu 7,800 ppb Tc 170 ppm ²³⁶ U	Moderate*
K-1131 K-1420	Collecting ash for uranium recovery and cleaning of tower filters	1952-1961 1960-1963	Estimated levels in ash 13,000 ppb Np 440 ppb Pu 40,000 ppb Tc 170 ppm ²³⁶ U	High
K-1231 K-1410	U recovery from ash, processes included ash pulverizer	1952-1963 1952-1962	Estimated levels in ash 13,000 ppb Np 440 ppb Pu 40,000 ppb Tc 170 ppm ²³⁶ U	High
K-1131 K-1410	Maintenance and repair of fluorination tower and associated equipment	1952-1961 1952-1962	Estimated levels 13,000 ppb Np 440 ppb Pu 40,000 ppb Tc 170 ppm ²³⁶ U	High

6.3 IDENTIFICATION AND EVALUATION OF PROCESSES OR FACILITIES THAT INVOLVED POTENTIAL ENVIRONMENTAL CONTAMINATION

Process knowledge and a review of documentation narrowed activities that involved potential environmental contamination by the RU constituents of concern to two activities:

- Venting of ⁹⁹Tc to the atmosphere from the ORGDP enrichment cascade
- Discharges of RU constituents in sludge primarily from the K-1420 decontamination facility to the K-1407-B and –C holding ponds

6.4 DISCUSSION OF DATA SOURCES

The project team searched a variety of data collections and libraries at ETTP and other Oak Ridge Complex locations to identify and retrieve data. Major data sources consulted and analyzed included:

- Nuclear Materials Control and Accountability (NMC&A) Material Balance Reports, including shipping, receiving, and inventory records.
- Nuclear Materials Management and Safeguards System (NMMSS) data.
- ORGDP historical site reports, including quarterly plant reports and engineering progress reports.
- ORGDP reports describing facilities and production processes.
- Plant records, including employment and health physics records.
- ORGDP production records.
- ORGDP analytical laboratory records.
- Correspondence between shippers and receivers.
- Historical DOE and contractor reports addressing RU
- More recent (i.e., post-1990) health physics reports on the site.
- More recent environmental survey reports on the site.
- Interviews with ORGDP personnel or with personnel with direct experience with enrichment operations.

Few gaps were identified in shipping and receiving data. Where NMC&A data was unavailable, NMMSS data was used. Team members worked with representatives of other DOE sites with which ORGDP interfaced via RU streams to verify shipping and receiving data and reconcile differences between sites. Any unresolved data discrepancies will be turned over to the DOE Working Group Team for assistance with resolution.

In addition to consulting the ORGDP analytical laboratory records, the team found it necessary to glean analytical data from a wide variety of sources, including the ORGDP

historical quarterly reports and health physics reports. Correspondence between shippers and receivers also provided a record of comparisons of sets of analytical data, the first set developed by the site shipping RU and the second by the site receiving the material. In addition, analytical data has been compared and shared with other appropriate DOE sites.

For some areas that presented gaps in data that could not at present be filled by research, the project team developed estimates for quantities of RU and/or constituents. These estimates are based on extrapolations from actual data and represent (1) application of known data from similar material and/or circumstances or (2) application of known data from a specific time period over a longer or a shorter period of time. All such estimates and their bases are specifically identified in this report.

The approach used in searching for and collecting data useful to the project team's purpose was suitably comprehensive in terms of targeting the broad range of likely sources and locations of data. However, because of limitations involving time and resources, the Site Team could not absolutely verify that all relevant and useable historical data and records were identified and reviewed.

As a result of the brief but intensive search, the project team determined that a significant amount of information exists to address the scope and objectives established for this phase of the RU project. Further, results of this current effort have extended previous evaluations and have, in some instances, served to confirm earlier work. With respect to constituent analysis, a significant quantity of data was found and evaluated.

6.5 CONCLUSIONS

6.5.1 Potential Personnel Exposure

The ORGDP Site Team's analysis of ORGDP activities that would have involved potential worker exposure to the RU constituents of concern identified three activities that the team rated "High" in occupational exposure potential and one other activity that was rated high for a brief period over four months in 1953 (Table 6.2-1). These activities represent the set of ORGDP processes that the Site Team believes involve significant implications for personnel exposure to RU constituents. All four activities were associated with oxide conversion to UF₆ for feed or with the maintenance of related feed plant equipment. The activities and the locations with which they were associated are:

- Unpacking, feeding, and sampling of UO₃ (K-1131)*
- Collecting ash for uranium recovery and cleaning tower filters (K-1131 and K-1420)
- Uranium recovery from ash (K-1231 and K-1410)
- Maintenance and repair of fluorination tower and associated equipment (K-1131 and K-1420)

With the exception of the unpacking, feeding, and sampling of UO₃ (which only presented "High" occupational exposure potential during a brief period), the occupational exposure potential resulted primarily from hazards posed by fluorination tower ash. An examination of

^{*}Only during January-April 1953 when K-1131 received UO₃ from Hanford that contained Pu up to 40 ppb.

the activities with significant implications indicates that they occurred at the following four locations during the designated time frames:

- K-1131 feed facility (1952–1961)
- K-1231 ash pulverization and uranium recovery facility (1952–1963)
- K-1410 decontamination and uranium recovery facility (1952–1962)
- K-1420 feed facility (1960–1963)

Although both K-1131 and K-1420 performed feed facility functions, K-1131 processed much greater quantities of RU during 1952–1961 than the relatively small portion of K-1420 devoted to feed production did during 1960–1963.

Early in its existence, ORGDP implemented a worker protection program that included worker radiological protection (see Section 2.4.2). This program incorporated elements such as personnel protective equipment, personnel monitoring, environmental monitoring, work location surveys, work-time limits on jobs with penetrating radiation, excretion rate limits, periodic examinations of personnel, and Plant Action Level limits. The inhalation of radioactive materials was recognized as the most important source of possible exposure at ORGDP. Consequently, administrative controls were primarily designed to guard against associated hazards.

Worker protection measures in place at ORGDP likely provided substantial mitigation to the risks introduced by the activities rated as "High" in occupational exposure potential. However, dose assessment studies may be warranted as a follow-on activity to provide a more detailed assessment of worker exposure.

6.5.2 Potential Environmental Contamination

An Oak Ridge Dose Reconstruction Project was initiated in 1994 as follow-up to the Oak Ridge Dose Reconstruction Feasibility Study, which recommended a closer examination of past uranium emissions and potential resulting exposures (see Section 2.5). The Task 6 component of the project involved further evaluation of Oak Ridge uranium operations and effluent monitoring records to determine if uranium releases from the ORR likely resulted in off-site doses that warranted further study. The results were documented in the July 1999 Task 6 report entitled *Uranium Releases from the Oak Ridge Reservation—a Review of the Quality of Historical Effluent Monitoring Data and a Screening Evaluation of Potential Off-Site Exposures*. The Task 6 team concluded that earlier estimates of uranium releases had been underestimated. However, based on the decision guidelines from the Oak Ridge Health Agreement Steering Panel, the Task 6 team concluded that while ORGDP uranium releases are candidates for further study, they are not high-priority candidates.

The Task 7 component of the project involved performing qualitative and quantitative screening of various materials of concern at ORGDP and the other DOE Oak Ridge sites. Materials screened included Np and ⁹⁹Tc. Results were reported in the Task 7 report, *Screening Level Evaluation of Additional Potential Materials of Concern*. Based on the analysis of data, the Task 7 team determined that Np did not warrant further study. Although ⁹⁹Tc was identified as one of the potential candidates for further study, it was not determined to be a high-priority candidate.

These analyses, along with other information on environmental consequences from ORGDP operations, identify candidate environmental issues for additional study. However, candidate issues related to the processing of RU have not been determined to be high-priority candidates for further study.